

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KNOLL, INC.,

Plaintiff,

No. 11 cv. 0488 (AKH)
ECF CASE

-against-

MODERNO, INC. AND URBAN MOD, INC.
d/b/a REGENCY SHOP, AND MIKE SAXENA

Defendants.

MOTION BY KATSH & ASSOCIATES LLC AND ROBERT TILEWICK, ESQ.
FOR AN ORDER UNDER LOCAL RULE 1.4 GRANTING LEAVE TO
WITHDRAW AS COUNSEL OF RECORD FOR DEFENDANTS

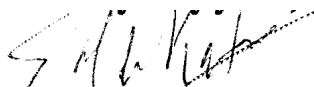
Katsh & Associates LLC and Robert Tilewick , Esq. (collectively “Counsel”) respectfully move for an Order under Local Rule 1.4 for leave to withdraw as counsel of record for defendants herein. Defendants have terminated Katsh & Associates LLC as their counsel in this case, and Mr. Tilewick, who was hired as a part time contract attorney to assist Katsh & Associates, lacks the facilities or resources to represent defendants in this matter on his own and never was retained to do so.

This motion also requests a 60-day stay of proceedings in this case so as to permit defendants an adequate opportunity to retain substitute counsel. Katsh & Associates LLC and Mr. Tilewick are prepared to assist defendants in finding substitute counsel and otherwise to ensure a smooth transition.

This motion is based on the annexed declarations of Katsh & Associates LLC and Mr. Tilewick. A proposed form of Order is attached to this motion.

Respectfully submitted,

Dated: April 23, 2012



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Defendants.

ORDER

Upon the declarations of Salem M. Katsh of Katsh & Associates LLC, and Robert Tilewick, Esq., and good cause having been shown,

IT IS HEREBY ORDERED this ____ day of April, 2012, that:

1. Pursuant to Local Rule 1.4, leave is granted to Katsh & Associates LLC and Robert Tilewick, Esq. to withdraw, and they are hereby withdrawn, as counsel of record for defendants;
2. Defendants shall have sixty (60) days from the date of this Order to retain substitute counsel during which time period proceedings in this case shall be stayed;
3. A conference shall be held on June 30, 2012, to set appropriate revisions to the Case Management Order.

U.S.D.J.

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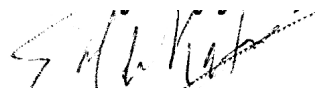
MODERNO, INC. AND URBAN MOD, INC.
d/b/a REGENCY SHOP, AND MIKE SAXENA

Defendants.

CERTIFICATE OF SERVICE

The within MOTION BY KATSH & ASSOCIATES LLC AND ROBERT TILEWICK, ESQ. FOR AN ORDER UNDER LOCAL RULE 1.4 GRANTING LEAVE TO WITHDRAW AS COUNSEL OF RECORD FOR DEFENDANTS, and supporting declarations by SALEM M. KATSH AND ROBERT TILEWICK, were ECF served today on all counsel, and were served on defendants by email and by Federal Express priority mail, to Unit 2, 1625 West 144th Street, Gardena, CA 90247.

April 23, 2012



Salem M. Katsh